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## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SCOTT D.H. REDMAN, individually and on behalf of others similarly situated,

Civil Action No. 3:17-cv-4531-PGS-TJB

Plaintiff,

v.

CAPITAL ADVANCE SOLUTIONS, LLC, a New Jersey limited liability company,

Defendant.

DECLARATION OF COUNSEL IN SUPPORT OF THE ENTRY OF JUDGMENT

## PETER E. LEMBESIS, of full age, hereby declares as follows:

- 1. I am an attorney at law of the State of New Jersey and a member of Dunn Lambert, L.L.C., attorneys for Plaintiff/Petitioner. As such, I have personal knowledge of the facts contained herein and am authorized to make this declaration on Plaintiff's behalf.
- 2. On June 20, 2017, Plaintiff commenced this action to enforce a subpoena issued in an action pending in the Northern District of Illinois. (Docket Entry #1).

3. On May 14, 2018, the Court entered an Order directing Defendant/Respondent

Capital Advance Solutions ("Capital") to pay Plaintiff \$14,091.00 in attorney's fees and costs

arising from Plaintiff's efforts to enforce the afore-mentioned subpoena. The Court directed that

payment was to be made within 30 days of the date of the Order. (Docket Entry #23, p. 8).

4. Thirty (30) days have now expired since the entry of the Order. Capital has failed

to make payment. Accordingly, Plaintiff respectfully requests the Court enter judgment, in the

amount of \$14,091.00, in favor of Plaintiff and against Defendant.

I declare under penalty of perjury under the laws of the State of New Jersey and the

United States of America that the foregoing is true and correct.

PETER E. LEMBESIS

Dated: July13, 2018